

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

JUNG SOON LEE, (Deceased) ) CIVIL ACTION NO. 05-0031  
By SUNG YOUNG LEE, Personal )  
Representative, )  
Plaintiff, )  
v. )  
DONG GUK CORPORATION, )  
Defendant, )  
AND RELATED ACTIONS. )

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DEPOSITION OF MR. LEE, SUNG CHUN

Taken at the Law Offices  
of the Torres Brothers, LLC  
Bank of Guam Building, 3<sup>rd</sup> Floor  
Garapan, Saipan  
Commonwealth of the Northern Mariana Islands

March 22, 2007

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Transcribed by:  
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Exhibit A

1 with when eating. They likes to enjoy with the alcohol.

2 Q Have you ever served alcohol after 2:00 a.m.?

3 INTERPRETER: Yes, he can.

4 Q And, is that you, personally? Have you, personally,  
5 served?

6 INTERPRETER: He said that he's the owner, he never no  
7 serve food -- ah, he's, personally, never no serve, but only  
8 the problem is the, like from Korean the Asiana air --  
9 airplane? Somebody come from Korea or he's very good  
10 friends and they come late with the airplane and then they  
11 wanna hungry and they eat, enjoy, and they ask the alcohol,  
12 at that time he making decision and let go.

13 Q And, when that happens from Asiana, that's the -- the  
14 time you allowed to serve alcohol after 2:00 a.m. or  
15 when his friends come in from Asiana?

16 INTERPRETER: He say after 2:00 a.m. he got no choice  
17 to serve some friends from Korean because ah, near to his  
18 business he got lot of restaurant too, but they also  
19 serving. If he doesn't serving the alcohol, whatever they  
20 order? And they will not -- he's gonna lose his own  
21 customer, so he got no choice.

22 Q So, ah he serve after 2:00 a.m. to compete with the  
23 other business?

24 INTERPRETER: He say yes because ah, compete with other  
25 restaurants, he have to keep his own customer.

1 Q If you don't -- if you stop after 2:00 a.m., you're  
2 gonna lose some customers? To other restaurant?

3 INTERPRETER: He say yes, he's gonna lose his customer.

4 Q So, it's ah, important to -- in order to make a -- to  
5 keep the business and customers, to serve after 2:00  
6 a.m.?

7 INTERPRETER: Yes.

8 ...[deponent continuing].

9 INTERPRETER: He say that ah, some of customer they come  
10 asking after 2:00 o'clock for the alcohol and then he -- he  
11 explain first what's the reason why he doesn't wanna serve  
12 the alcohol, because the law is cannot after 2:00 o'clock,  
13 it's very hard for him to sell it, but he lost -- he try, he  
14 lost a lot of customer for that, so he got no choice,  
15 sometimes he explain first and then he let go.

16 Q Do you know that it could be dangerous, it could be  
17 unsafe to serve alcohol after 2:00 a.m.?

18 MR. LONG: I'm gonna object to the form of the question  
19 because I don't know how, what basis you say it's unsafe to  
20 serve after 2:00 a.m. as opposed to unsafe after 8:00  
21 o'clock p.m. There's no basis for that, so I object to the  
22 form of that whole question, other than that the witness can  
23 answer.

24 MR. TORRES: Do you want me to rephrase? Repeat?  
25 ...[translation].